

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

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Attorneys for Defendant  
AMCO INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DOUGHERTY,

Plaintiff,

v.

AMCO INSURANCE COMPANY, and DOES  
ONE through TWENTY, Inclusive,

Defendant.

) CASE NO. C 07-01140 MHP  
)  
)  
)

**DEFENDANT AMCO INSURANCE  
COMPANY'S AMENDED INITIAL  
DISCLOSURES PURSUANT TO FEDERAL  
RULES OF CIVIL PROCEDURE, RULE 26**  
)  
)  
)

Defendant AMCO Insurance Company ("AMCO") hereby makes the following amended  
initial disclosures pursuant to Federal Rules of Civil Procedure Rule 26(a)(1):

**A. Witnesses**

The name, address and telephone number of each person likely to have discoverable  
information which AMCO may use to support its defense of Plaintiff's claims are:

1. Christine Dougherty  
2 Sinaloa Court  
Novato, CA 94947  
(415) 897-1101

2. Malcolm Rayburn  
2 Sinaloa Court  
Novato, CA 94947  
(415) 897-1101

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3. Glenn Osmidoff  
140 San Carlos Way  
Novato, CA 94947  
(415) 898-9261
4. Darrell Wayne Anderson  
2006 Mora, Apt. 10  
Calistoga, CA 94515  
(707) 942-8141
5. B. Welch  
California Highway Patrol  
53 San Clemente Drive  
Corte Madera, CA 94925  
(415) 924-1100
6. Gina Todd  
USAA Casualty Insurance Company  
P.O. Box 15506  
Sacramento, CA 95852  
(800) 531-8222
7. Jeff Mangone  
AMCO Insurance Company  
Pacific Coast Regional Office  
2301 Circadian Way  
P.O. Box 849  
Santa Rosa, CA 95402-0849  
(800) 552-2437
8. Julie Nickell  
AMCO Insurance Company  
Pacific Coast Regional Office  
2301 Circadian Way  
P.O. Box 849  
Santa Rosa, CA 95402-0849  
(800) 552-2437
9. Linda Howard  
AMCO Insurance Company  
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2301 Circadian Way  
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Santa Rosa, CA 95402-0849  
(800) 552-2437
10. Ernest H. Sponzilli, M.D.  
Mt. Tam Orthopedics  
1341 South Eliseo Drive  
Greenbrae, CA 94904  
(415) 924-8900

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11. Paula Abdaub, R.N.  
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1341 South Eliseo Drive  
Greenbrae, CA 94904  
(415) 924-8900
12. Mark S. Lawler, M.D.  
Marin Orthopedic & Sports Medicine  
4000 Civic Drive, Suite 205  
San Rafael, CA 94903-5233  
(415) 492-1600
13. Charles Peri, M.D.  
Novato Acupuncture & Herb Clinic  
1531-E South Novato Boulevard  
Novato, CA 94949  
(415) 897-4678
14. Linda Kozitza-Pepper, Ph.D.  
3 Hamilton Landing, Suite 230  
Novato, CA 94949  
(415) 883-8332
15. Michele Cohen, M.P.T.  
Novato Back Care and Sports Rehabilitation  
505-B San Marin Drive, Suite 180  
Novato, CA 94945  
(415) 898-1311
16. Stephen M. Murphy, Esq.  
Law Offices of Stephen Murphy  
44 Montgomery Street, Suite 1000  
San Francisco, CA 94104  
(415) 986-1338
17. Nikki Hall, Esq.  
Law Offices of Stephen Murphy  
44 Montgomery Street, Suite 1000  
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(415) 986-1338
18. David M. Porter, Esq.  
Law Offices of David M. Porter  
101 California Street, Suite 2200  
San Francisco, CA 94111  
(415) 982-8600
19. Renton Rolph, Esq.  
Law Offices of Justin D. James  
One Front Street, Suite 1250  
San Francisco, CA 94111  
(415) 837-3820

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20. Vincent B. McGlorg, Esq.  
Law Office of Vincent B. McLorg  
185 Prospect Avenue  
San Anselmo, CA 94960  
(415) 686-1485

21. The Honorable Alfred Chiantelli, Judge (ret.)  
ADR Services, Inc.  
50 Fremont Street, Suite 2110  
San Francisco, CA 94105  
(415) 772-0900

AMCO lists all the above-referenced persons out of an abundance of caution, acknowledging that as discovery develops and as the parties may reach agreement or stipulation regarding certain facts and/or issues, certain persons listed above may not be necessary to the resolution of this matter.

AMCO reserves the right to amend, modify and supplement this list of witnesses.

AMCO reserves the right to identify and call as witnesses each person identified by Plaintiff in this action.

AMCO's investigation and discovery in this action are continuing and AMCO reserves its right to amend, modify and supplement these disclosures as it may deem necessary and appropriate based on its discovery of additional information.

**B. Documents**

AMCO herewith discloses the following documents:

1. Certified copy of AMCO Insurance Company Policy No. PPA 0008899321-1 (Bates-stamped pages 020001-020063, with "Copy Certification by Custodian of Records" page).
2. Non-privileged portions of AMCO's claim file diary notes regarding claim no. 84M33976 (Bates-stamped pages 010082-010124).
3. Non-privileged portions of AMCO's claim file regarding claim no. 84M33976 (this matter) (Bates-stamped pages 010001-010081, 010125-011278).
4. Privilege log.

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5. Electronically-Stored Information: AMCO has undertaken to preserve all electronically-stored information regarding Plaintiff's underinsured motorist claim. AMCO hereby identifies the following sources of electronically-stored information:

- a. Lotus Notes (e-mail software system);
- b. Passport (the above noted claim file diary notes); and
- c. Automated Workflow Distribution (a workflow and imaging system used to electronically route and store business documents).

Non-privileged electronically-stored information is included in the documents described in categories 2 and 3 above.

AMCO reserves the right to augment, amend, modify and supplement this list of documents.

AMCO reserves the right to offer and use as evidence all documents identified and disclosed by Plaintiff in this action.

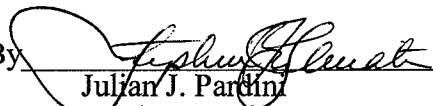
AMCO's investigation and discovery in this action are continuing and AMCO reserves its right to augment, amend, modify and supplement these disclosures as it may deem necessary and appropriate based on its discovery of additional information.

Dated: June 22, 2007

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH LLP

By

  
Julian J. Pardini

Stephen J. Liberatore

Attorneys for Defendant

AMCO INSURANCE COMPANY